

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

Case No. 17-BK-3283 (LTS)

Jointly Administered

**APPLICATION FOR ADMISSION *PRO HAC VICE* BY THERESA A. FOUDY**

COMES NOW Theresa A. Foudy (“Applicant”) respectfully stating and praying as follows:

1. Applicant is an attorney with the law firm of Morrison & Foerster LLP, with offices at:

**Address:** 250 West 55th Street, New York, NY 10019

**Email:** tfoudy@mofo.com

**Telephone:** 212-336-4482

**Fax:** 212-468-7900

2. Applicant has been retained as counsel by certain creditors, referred to as the “Ad Hoc Group of Constitutional Debtholders”<sup>2</sup>, that hold bonds issued or guaranteed by the Commonwealth of Puerto Rico.

3. Applicant will sign all pleadings and papers with the name Theresa A. Foudy.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (9686).

<sup>2</sup> See *Eighth Supplemental Verified Statement of the Ad Hoc Group of Constitutional Debtholders Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Case No. 17-3283-LTS, Docket No. 14520].

4. Since May 18, 1994, Applicant has been and presently is a member in good standing of the Bar of the highest court in the State of New York, where Applicant regularly practices law.

Applicant's New York State bar license number is 2614204.

5. Applicant has been admitted to practice and is a member in good standing of the bar in the following courts:

<b>Court</b>	<b>Admission Date</b>
U.S. Court of Appeals for the First Circuit	2012
U.S. Court of Appeals for the Second Circuit	1998
U.S. Court of Appeals for the Third Circuit	1994
U.S. Court of Appeals for the Ninth Circuit	2009
United States District Court for the Southern District of New York	1995
United States District Court for the Eastern District of New York	1995

6. Applicant hereby attests that she is not suspended from practice nor has she been the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges in any court or jurisdiction.

7. Applicant has not filed for pro hac vice admission in the U.S. District Court for the District of Puerto Rico in the preceding three years.

8. Local counsel of record associated with applicant in this matter are:

Gerardo A. Carlo-Altieri  
M<sup>a</sup> Mercedes Figueroa y Morgade  
G. Carlo-Altieri Law Offices, LLC  
254 San Jose St., Third Floor  
San Juan, Puerto Rico 00901  
Phone: (787) 247-6680  
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figueroaymorgadelaw@yahoo.com

9. Applicant has read the Local Rules of this Court and will comply with them including the provision which requires the payment of an admission fee in the amount of \$300.00 to the Clerk, U.S. District Court.

**WHEREFORE**, Applicant respectfully requests to be admitted *pro hac vice* in the United States District Court for the District of Puerto Rico for the above-styled case only.

Date: October 22, 2020

Theresa A. Foudy

Printed Name of Applicant



Signature of Applicant

**CERTIFICATE OF LOCAL COUNSEL AND OF SERVICE**

We hereby certify pursuant to L.Cv.R. 83A(f) that we consent to the designation of local counsel of record for all purposes and that we caused to be delivered a copy of the foregoing to the Clerk of the Court with the admission fee or made payment electronically. We also certify that we filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties required to receive notice in the captioned proceeding. In San Juan, Puerto Rico, this \_\_th day of October 2020.

**G. CARLO-ALTIERI LAW OFFICES, LLC**

By: \_\_\_\_\_  
Gerardo A. Carlo  
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Telephone: (787) 247-6680  
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By: \_\_\_\_\_  
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**ORDER**

The Court, having considered the above Application for Admission *Pro Hac Vice*, hereby orders that the application is granted.

The Clerk of Court shall deposit the admission fee into the account of Non-Appropriated Funds of this Court under the authority of L.Cv.R. 83A(f).

SO ORDERED.

In San Juan, Puerto Rico, this \_\_\_\_ day of October 2020.

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Hon. Laura Taylor Swain  
U.S. District Court Judge